UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
WC-15J

NOV 27 2017

CERTIFIED MAIL 7016 3010 0000 9203 4622
RETURN RECEIPT REQUESTED

FOIA Ex. 6 (Personal Priacy) Farms, LLC
Ex. 6 (Personal Privacy)
Ex. 6 (Personal Privacy)

Subject: September 1, 2017 Clean Water Act Compliance Inspection

Dear Ex. 6 (Personal Privacy)

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Report for the Concentrated Animal Feeding Operation (CAFO) inspection conducted at FOIA Ex. 6 (Personal Farms on September 1, 2017. The purpose of the inspection was to evaluate and document compliance of FOIA Ex. 6 (Personal Priacy) Farms with the Clean Water Act and the 2014 Administrative Order on Consent (Docket Number V-W-14-AO-01).

During the inspection, EPA noted areas of concern. Specifically, see numbers 1-4 on pages nine and ten of the enclosed inspection report. Within 30 days, please let us know how you have addressed or intend to address these areas of concern.

If you have questions or concerns regarding this report, or believe any part of the report is not accurate, please contact Joan Rogers of my staff at (312) 886-2785 or rogers.joan@epa.gov.

Sincerely,

Ryan J. Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Enclosures

Cc: Casey Jones, WDNR
Erin Carviou, WDNR

CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose:
Compliance Evaluation Inspection

Facility:
FOIA Ex. 6 (Personal Farm, LLC
FOIA Ex. 6 (Personal Priacy)
Denmark, WI 54208
FOIA Ex. 6 (Personal Priacy)

NPDES Permit Number: No permit

Date of Inspection: September 1, 2017

EPA Representatives:

Joan Rogers	Rogers.joan@epa.gov	312-886-2785

State Representatives:

Casey Jones	Casey.Jones@wisconsin.gov	920-303-5426
Eric Evensen	Eric.Evensen@wisconsin.gov	920-303-5447
Erin Carviou	Erin.Carviou@wisconsin.gov	920-662-5419

Facility Representatives:
Ex. 6 (Personal Privacy) Ex. 6.(Personal Privacy) Ex. 6 (Personal Privacy)

Report Date:
October 12, 2017

Inspector Signature Joan Rogers

Approver Signature:

Approval Date: 11/27/17

1. BACKGROUND

The purpose of this report is to describe, evaluate and document [redacted] Farm's compliance with the Clean Water Act (CWA) at its Denmark, Wisconsin facility on September 1, 2017. Additionally, the intent of the inspection was also to document the facility's compliance with an Administrative Order on Consent (AOC) that was finalized on July 15, 2014 (Docket Number V-W-14-AO-01) between the EPA and [redacted] Farm, LLC. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

[redacted] Farm (Sandway) is a dairy operation. It maintains approximately 650 mature dairy cows and approximately 300 heifers and calves. Based on the number of mature dairy cows, [redacted] is a medium Animal Feeding Operation (AFO). [redacted] has applied for a Wisconsin Pollutant Discharge Elimination Permit (WPDES) as it intends to increase the herd size to 750 mature dairy cows. EPA was joined by personnel from WDNR who intended to utilize the inspection for evaluation for permit issuance.

Surface flow off the production area is to the south to a perennial unnamed tributary. This perennial unnamed tributary flows 1.3 miles to the southeast to a wetland complex. The flow of surface water goes approximately 2.0 miles through the wetland before it outlets into a perennial unnamed tributary. From there, the flow goes 1.1 mile to perennial Jambo Creek, another 5.0 miles to perennial East Twin River and then 12.8 miles to the bay of Green Bay. The bay of Green Bay is a Traditional Navigable Water, as is the last 3 miles of the East Twin River.

The 2014 AOC was agreed upon by EPA and Sandway after EPA observed deficiencies at the facility following an inspection in April 2013.

2. SITE INSPECTION

Table 1: Site Entry

Arrival Time:	9:30 A.M.
Temperature:	57°F
Precipitation:	None
Presented credentials?	Yes
Credentials presented to whom and at what time?	The owner of Sandway Farms, LLC
EPA vehicle parked in approved location?	Yes
Location where EPA vehicle was parked?	West of the Milking Parlor
Disposable boots worn?	Yes
Other bio-security measures taken:	Vehicle washed following the inspection.

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used	
R5 CAFO Inspection Checklist (Boilerplate Inspection Report)	
Facility Documents Reviewed:	
CNMP was reviewed prior to the inspection.	
WDNR Letter – WPDES CAFO Permit Status	
Facility inspection documentation	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No
Which information does the facility consider to be CBI?	N/A

Table 3: Facility Description

Type of Animal	Number of Animals	Capacity	Type of Confinement
Calves	85	At capacity	Under roof/open confinement
Heifers 400#-800#	160	At capacity	Under roof
Heifers 800#-1200#	46	At capacity	Under roof (Close Up Cow Barn)
Milking/Dry Cows	650	At capacity	Under roof
Minimum Number of Animals in previous 5 years:			Approximately 500
Maximum Number of Animals in previous 5 years:			650
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			650
Amount of Liquid Manure Generated per year:			7 million gallons
Amount of Solid Manure Generated per year:			2,000 tons
Does the facility have an NPDES Permit?			No
SIC or NAICS code:			0241
CAFO Designation/Defined Date (If a designated CAFO)			April 18, 2013
CAFO Designation/Defined Reason (If a designated CAFO)			Number of animals and discharge of pollutants from a man-made conveyance.
Do animals have direct access to WOUS?			No
Are crops, vegetation, forage growth, or post harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?			Yes. 40 dry cows are allowed into Pasture #2.
How many employees (not counting family members)?			Unknown

Other facilities under common ownership (name and address): No

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Amount of Waste Removed	Days of Storage
Waste Storage Pond #1	612,612 gallons	Concrete	No	One week ago	Total 5-6 million gallons	>365 with Waste Storage Pond #2.
Waste Storage Pond #2	10,888,673gallons	Concrete	Yes	One week ago		>365 with Waste Storage Pond #1
Stacking Pad	Approximately 110' x 120'	Concrete	No	Used for overwinter stacking		Overwinter

Records at site of storage structure design?	Yes
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.	Yes. Over the winter, straw bedding is stacked on the Stacking Pad which is sloped so the leachate will flow to Waste Storage Pond #2.
Are records kept of the level of manure in the storage structures?	Yes, monthly. Advised to keep weekly records of the depth of manure to be kept.
When was the last time a storage structure was emptied, either partially or completely?	One week ago.
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?	5-6 million gallons
Do the facility personnel inspect and keep records of all diversion devices?	Yes, inspected. No records of inspections. Advised to keep weekly records of inspections.
Do the facility personnel inspect and keep records of all impoundments?	Yes, inspected. No records of inspections. Advised to keep weekly records of inspections.
Do the facility personnel inspect and keep records of all the water lines?	Yes, inspected. No records of inspections. Advised to keep daily records of inspections.
Do the facility personnel perform routine visual inspections and keep records of the production area?	Yes
Does the waste storage system have a managed outfall or discharge point?	No

Has the facility had any documented discharges of livestock waste to surface water in the past year?	No
Are there safety devices installed around any manure storage ponds?	Fenced
Additional Information:	Plastic strips are installed on the ramp for depth markers.

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
Close Up Cow Barn #1: Daily hauled for land application or stacked until land application is possible. Dry Cow Barn: Daily hauled for land application or stacked until land application is possible. Calf Hutch Area: Scraped every 60 days and hauled for land application or stacked until land application is possible. Calf Barn: Scraped to west end and daily hauled for land application or stacked until land application is possible. Freestall Barn #2: Manure and process wastewater is scraped to a pit in the southeast corner of the barn. From here the manure and process wastewater is pumped to the southern portion of the Freestall Barn #1. Freestall Barn #1: Manure and process wastewater is scraped to a center alley where it flows by gravity (with help from an auger) to Storage Pond #1. An overflow weir between Waste Storage Pond #1 and Waste Storage Pond #2 allows manure and process wastewater to flow into Waste Storage Pond #2.	
Describe the way used bedding is collected and disposed of at the facility:	
Sand is used in the Freestall barns and is managed with the manure. Wheat Straw is used in the Close Up Cow Barns.	
Are mortality records kept?	Yes
Describe the way mortalities are managed at the facility:	
Sandy Bay Mink Farm is paid to take the mortalities.	
What type of method is used to provide drinking water for the animals?	Water Fountain Drinkers
Describe the way spilled drinking water is collected and disposed of at the facility:	
Handled with the manure.	
Describe the way mist cooling water is collected and disposed of at the facility:	
Handled with the manure.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
Chemicals are stored in the Milk House. Any spill of chemicals would go into floor drains that go to the Waste Storage Ponds.	

Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:
Handled with the manure.
Describe where water comes from that is used to clean and/or flush. (Wells, city, etc.)
Well water.
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:
Feed is stored in feed bunkers. Near the Calf Barn, silage is stored on the ground. Haylage is stored on the ground.
If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:
Plate cooler water is reused for drinking water. A 4000-gallon tank on the south side of the parlor holds the water until needed for drinking water for the cattle.
If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:
Wash water from the milking parlor is directed to the center alley in the Main Barn and then flows to Storage Pond #1.
If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:
Wash water from the milk tanks is directed to the center alley in the Main Barn and then flows to Storage Pond #1.

If a dairy, how many times per day are cows milked?	Three times per day.

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes
When was the last time a sample was taken of the manure and/or process wastewater?	Two weeks ago.
Describe the process to take the manure and/or process wastewater sample.	Sample is taken when loading the tankers after agitation.
Number of acres available for land application:	2250 acres
Are land application records kept?	Yes
Who applies the manure and process wastewater to the fields?	Contractor
Are weather conditions at time of application kept? (24 before – 24 after)	Yes
Does the facility perform and keep records of the soil testing?	Yes. Soil tests are needed this year.
Is manure transferred off-site to another party?	No
Are manure transfer records maintained?	N/A
Do facility personnel perform periodic inspection of land application equipment?	Yes

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
Flow from the north side of the facility flows to a roadside ditch which flows to the east to a storm water channel. The ditch on the east side of the facility has been tiled and flows south along the east side of the Waste Storage Pond #2 and outlets in Pasture #3, south of Waste Storage Pond #2. It then flows south to the perennial unnamed tributary. Flow from the west side of the facility north of the Dry Cow Barn flows to a storm water gutter which is tied into the piping for a ditch on the west side of the facility. The piping for the ditch on the west side of the facility outlets just south of Bunker #7 and flows south to the perennial unnamed tributary. Flow from the west side of the facility south of the Dry Cow Barn flows to the south to the collection pit at the southwest corner of the Feed Storage Pad. Flow from the area by the Cattle Walkway, the Dry Cow Feedlot, and the Calf Hutches, flows south to Pasture #2.	
How many months out of the year is there flow in the nearest surface water pathway:	At least nine months out of the year.
Are there any storm water pathways entering the facility?	No
Are there any clean water ponds on site?	No
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	East Twin River three miles from the mouth of the river.
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Perennial
Has the surface water pathway nearest to the facility been assessed for water quality?	No

Table 8: Nutrient Management Plan

NMP on site?	Yes
Date NMP Submitted:	2014
Planner Name/Company:	AgSource Laboratories
Date that the NMP was last updated:	August 2017
Storage Description:	Included
Amount of Manure Generated:	Included
Capacity of Storage:	Included
Duration of Storage:	Included. 414 days of storage. When increase herd size to 750 mature dairy cows, will have 354 days of storage.
Amount of Spreadable Land:	Included

Mortality Management Plan:	No
Clean Water Diversion System:	No
Direct Contact Prevention Plan:	No
Chemical Management Plan:	No
Conservation Practices:	Included
Manure Testing Protocols:	Included
Soil Testing Protocols:	Included
Land Application Protocols:	Included
Additional NMP comments:	None
Does the NMP reflect the current operational characteristics?	Yes
Are the number of acres owned/leased consistent with what is listed in the NMP?	Total land application acres available – 2,250 Acres owned – 725; Acres Rented – 1,040; Acres in agreements – 485

Table 9: Land Application Records - EPA did not review any land application records.

Table 10: Facility Records – See photos of facility records.

Table 11: NPDES Permit

Type of permit (General, individual)	An individual permit will be issued by WDNR, but the facility is not currently under a WPDES permit.

2.2 Walkthrough of the Facility

The description of the walkthrough is included in the Sandway Farm Photolog and Walkthrough (ATTACHMENT A).

2.3 Closing Conference and Post-Inspection

Table 12: Post Walk-Through

Were specific "Areas of Concern" discussed with facility personnel?	Yes
Who were the Areas of Concern discussed with?	
The owner of Sandway Farm, LLC	
Compliance assistance materials given to facility personnel:	
None	
Exit Time:	2:00 P.M.
Disposable Boots Left at Facility?	Yes
Vehicle Washed after leaving facility?	Yes
Date and Time that vehicle was washed:	September 2, 2017 at approximately 1:00 P.M.

Table 13: Waterway Documentation

List the pathway taken by EPA inspectors to document the waterway at the facility.
EPA observed the ditch on the west side of the facility, which had been tiled where it was next to the Close Up Cow Barn #1. A storm water gutter on the east side of the Close Up Cow Barn #1 was tied into this ditch tile pipe. EPA observed that the outlet of the tile pipe was partially clogged with straw, similar to the straw that was observed around the storm water gutter. Further south along the ditch on the west side of the facility, EPA observed the bypass pipe from the collection pit for the process wastewater from the Feed Storage Pad. EPA observed that the water by the outlet of the tile pipe was discolored black and appeared to be impacted by nutrients from the pipe. After the pipe outlet, there was approximately 35 feet before the ditch on the west side of the facility joined the unnamed perennial stream. There was no flow from this ditch into the unnamed perennial stream at the time of the inspection. EPA observed the unnamed perennial stream south of the facility. The stream was clear and EPA did not observe any solid debris on the bottom or sides of the stream. On the east side of the facility, EPA observed the outlet pipe for the tiled ditch on the east side of the facility. The small amount of water below this pipe appeared clear. Water from this pipe comes from north of Bolt Road and would flow south to the unnamed perennial stream. There was no flow in this pathway on the day of the inspection.

Table 14a: Sampling Information – EPA did not take any samples

3. AREAS OF CONCERN

EPA observed these areas of concern whereby pollutants have the potential to reach waters of the United States:

1) From the storm water gutter on the east side of the Close Up Cow Barn to the tiled ditch on the west side of the facility. EPA observed straw bedding on the ground around the storm water gutter intake that was similar to the straw that was partially clogging the outlet of the tile pipe.
2) From the Cattle Walkway, Dry Cow Feedlot and Calf Hutches to Pasture #2. The manure and process wastewater from these areas is not collected. During rain events, the manure and process wastewater would flow to the south to Pasture #2 and could potentially reach the unnamed perennial stream.
3) From the bypass pipe from the collection pit, to the ditch on the west side of the facility. During times of heavy rains, the pipe is designed to convey flow in excess of the 25-year/24-hour storm to bypass collection and flow, via an 18" pipe, to the ditch on the west side of the facility. Facilities cannot discharge unless an NPDES (WPDES in Wisconsin) permit authorizes it subject to approval

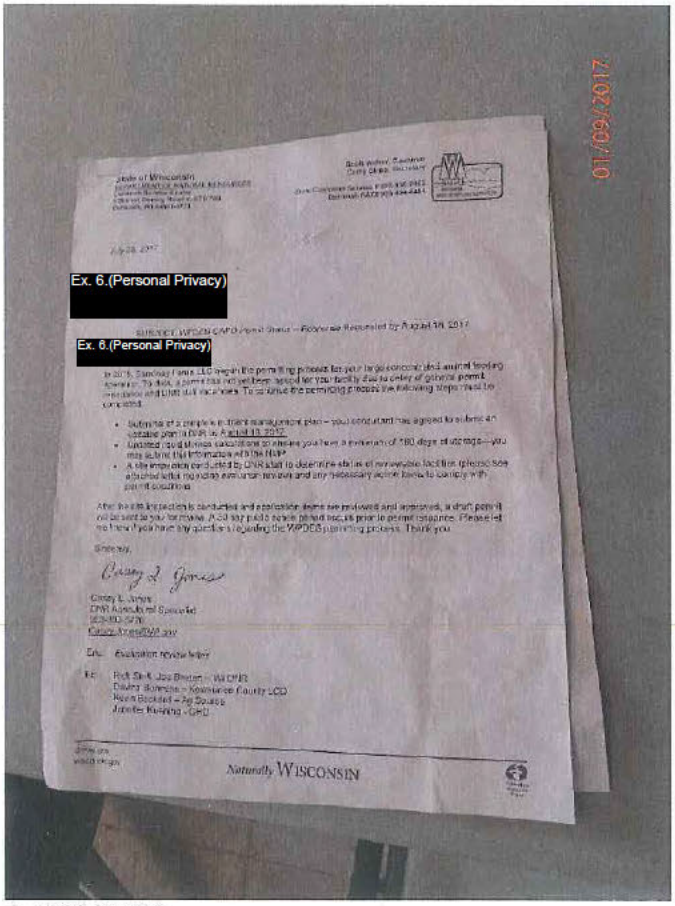
and conditions in the permit. The facility does not have an NPDES (or WPDES) permit. The addition of pollutants to the unnamed perennial stream could be considered a discharge.

4) From the VTA to the unnamed perennial stream. Although the facility collects the process wastewater from the Feed Storage Pad from all rain up to 0.4 inches of rain, any process wastewater that flows onto the VTA during a precipitation event less than or equal to the 25-year/24-hour storm and without an NPDES (or WPDES) permit and then flows into the unnamed perennial stream could be considered a discharge.

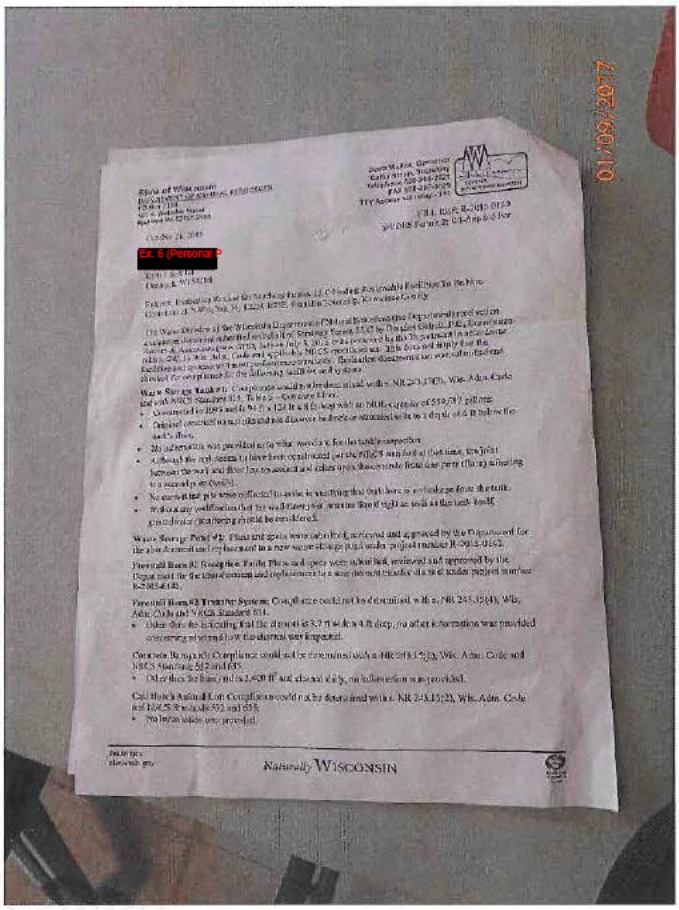
4. **LIST OF DOCUMENTS RECEIVED FROM FACILITY** EPA did not take any documents from the facility.

FOIA Ex. 6 (Personal Priacy) Farm, LLC
ATTACHMENT A: Photolog and Walkthrough
EPA Inspection September 1, 2017
All photos taken by Joan Rogers, Environmental Scientist, U.S. EPA
Camera: Olympus TG-4

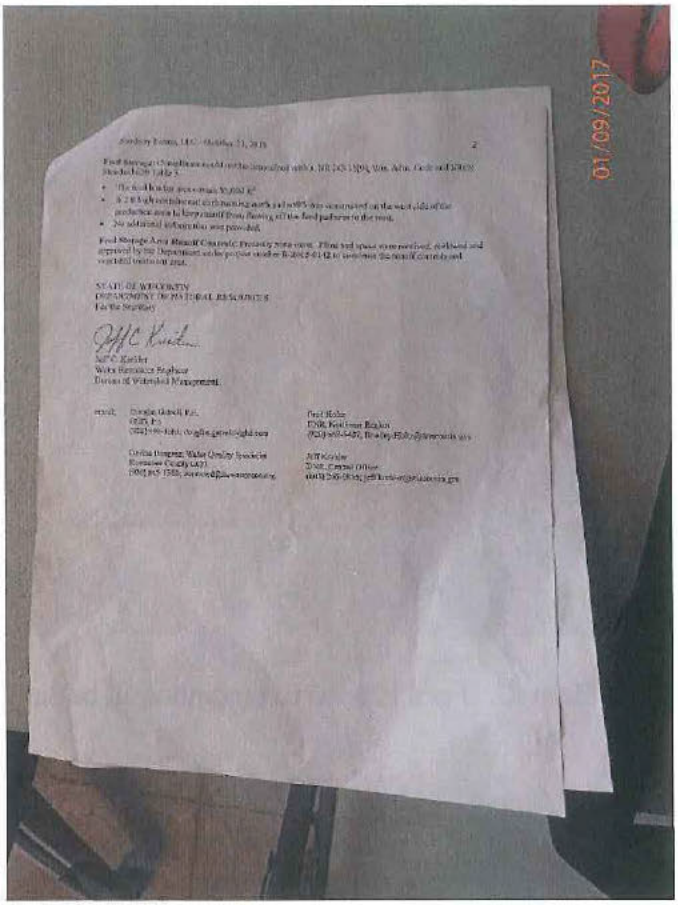
EPA reviewed documentation in the farm's office before the walkthrough. The following letter from the WDNR to FOIA Ex. 6 (Personal P...) Farms, LLC documented the information that WDNR needed before issuance of a CAFO WPDES Permit.



1: P9012509
Description: WDNR letter dated July 28, 2017 to FOIA Ex. 6 (Personal Priacy) Farms, LLC regarding CAFO permit status.
Location: In farm office.
Camera Direction: N/A
Date/Time: September 1, 2017 11:25 A.M.



2: P9012510
Description: Page one of Evaluation Review by WDNR for facilities at FOIA Ex. 6 (Personal Privacy) Farms, LLC.
Dated October 21, 2015.
Location: In farm office.
Camera Direction: N/A
Date/Time: September 1, 2017 11:25 A.M.



3: P9012511
Description: Page two of Evaluation Review by WDNR for facilities at FOIA Ex. 6 (Personal Privacy) Farms, LLC. Dated October 21, 2015.
Location: In farm office.
Camera Direction: N/A
Date/Time: September 1, 2017 11:25 A.M.

EPA began the walkthrough at approximately 10:30 A.M. on the west side of the facility east of the Close Up Cow Barn #1. EPA observed that although the barn had a roof overhang that protected the feed in the feed lane from being transported with precipitation, there was feed and bedding products in and around a grate that covered a storm water gutter that went across the facility driveway. This gutter was tied into the piping for the ditch on the west side of the facility. EPA advised that the feed and bedding be kept out of the gutter.

Feed and bedding also could be transported with precipitation from the south side of the Close Up Cow Barn #2 to the storm water gutter.

A formerly open ditch on the west side of the facility had been tiled. The outlet of the tile was along the former ditch pathway, just to the west of Bunker #7. EPA observed that the pipe outlet was partially clogged with straw that was similar to the straw bedding observed at the storm water gutter.

4: P9012512
Description: Machine Shed #2 and Close Up Cow Barn #1. Feed is open to precipitation but is mostly kept scraped under small overhang.
Location: East of Close Up Cow Barn #1.
Camera Direction: Northwest
Date/Time: September 1, 2017 11:44 A.M.

5: P9012513
Description: Gutter for storm water in driveway east of Close Up Cow Barn #1 has feed and bedding in the grate. Storm water from the gutter goes to the ditch on west side of facility.
Location: East of Close Up Cow Barn #1.
Camera Direction: Down
Date/Time: September 1, 2017 11:44 A.M.

6: P9012514
Description: Machine Shed #2 and Close Up Cow Barn #1. Feed is open to precipitation but is mostly kept scraped under small overhang.
Location: East of Close Up Cow Barn #1.
Camera Direction: Northwest
Date/Time: September 1, 2017 11:45 A.M.

7: P9012515
Description: Close Up Cow Barn #2 on left and Freestall Barn #2 in back. Feed in front of Close Up Cow Barn #2 is kept scraped so it is under the overhang. Storm water would flow to the grate and gutter to the west.
Location: East of Close Up Cow Barn #1.
Camera Direction: East
Date/Time: September 1, 2017 11:47 A.M.

8: P9012516
Description: Small amount of track in and track out in front of the Commodity Storage.
Location: East of Commodity Storage.
Camera Direction: West
Date/Time: September 1, 2017 11:48 A.M.

9: P9012517
Description: West side of Close Up Cow Barn #2. Note the grate for the storm water gutter in the pavement to the north of the tractor.
Location: East of Commodity Storage.
Camera Direction: Northeast
Date/Time: September 1, 2017 11:48 A.M.

10: P9012518
Description: Small amount of feed under the bulk bins on north side of Dry Cow Barn.
Location: Northwest corner of Dry Cow Barn.
Camera Direction: East
Date/Time: September 1, 2017 11:48 A.M.

11: P9012519
Description: The ditch on the west side of the facility has been piped underground. Breather pipe indicates location of the buried PVC pipe.
Location: Southwest corner of the Close Up Cow Barn #1.
Camera Direction: North
Date/Time: September 1, 2017 11:49 A.M.

12: P9012520
Description: Outlet of piped ditch on west side of facility. End of pipe is partially clogged with straw.
Location: South and west of Close Up Cow Barn #1.
Camera Direction: North and down
Date/Time: September 1, 2017 11:50 A.M.

13: P9012521
Description: After outletting at the surface, flow from the pipe goes overland to the west then to the south.
Location: South and west of Close Up Cow Barn #1.
Camera Direction: Southwest
Date/Time: September 1, 2017 11:50 A.M.

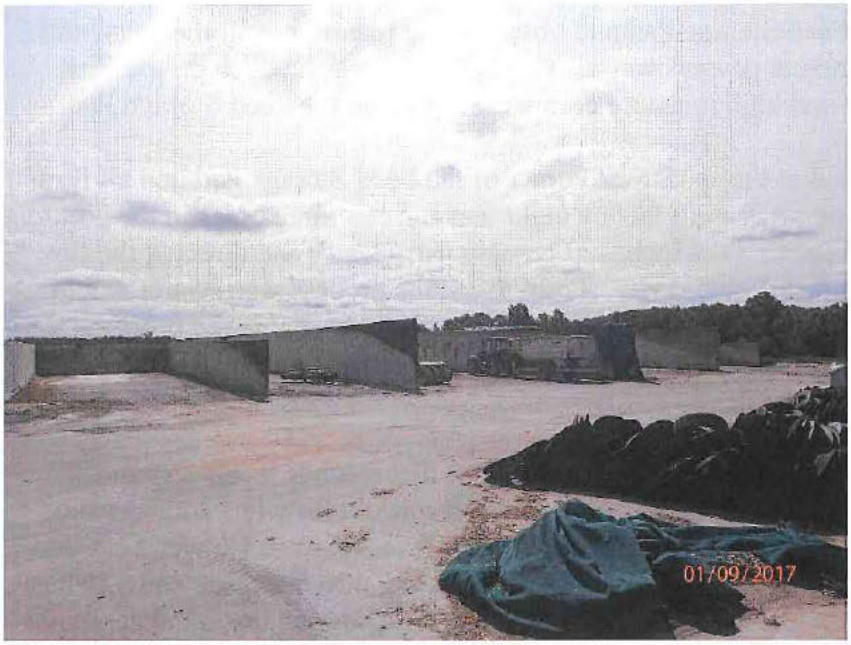
EPA then walked south on the Feed Storage Pad and observed the retaining wall that was built on the west side of the pad to prevent process wastewater from entering the ditch on the west side of the facility. Corn silage and high moisture corn were stored on the Feed Storage Pad.

A collection pit had been installed at the southwest corner of the Feed Storage Pad and all flow off the pad was directed to it. The pit is eight feet by eight feet and has three pipes in the bottom of it. The lowest pipe collected the first 0.4 inches of process wastewater and directed the flow to a concrete manhole to the southeast via gravity. From there, the process wastewater would flow to a collection tank that had a pump in it. The pump is designed to pump the process wastewater to the Waste Storage Pond #2. A timer is intended to shut the pump off when it had pumped the maximum volume for the day.

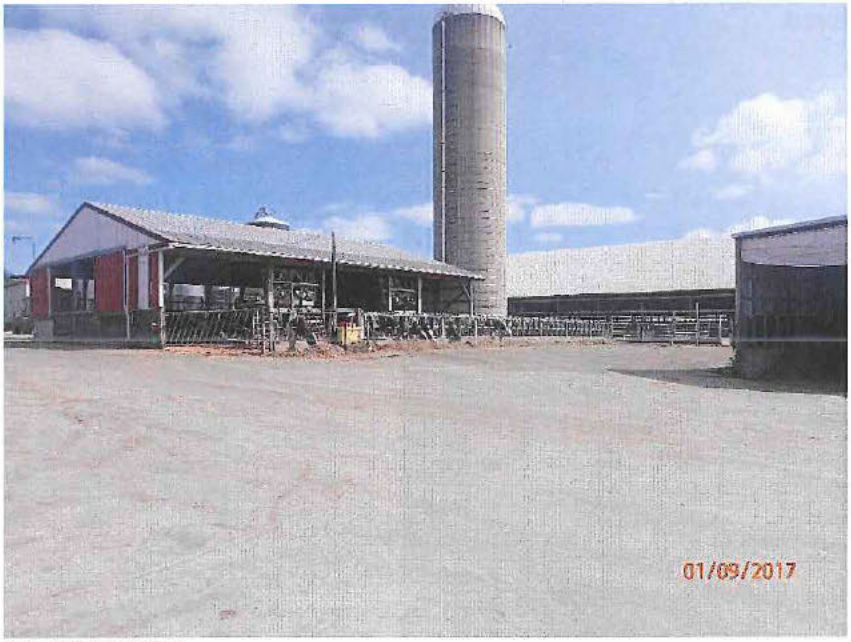
The middle/medium pipe would direct any process wastewater that reaches its level to the Vegetated Treatment Area (VTA). First the process wastewater would flow to a spreader box and when the level in the spreader box had reached two inches, it overflowed via weirs cut into the spreader bar. The process wastewater flowed to a VTA that was 120 feet wide and 321 feet long. Any process wastewater that flowed off the VTA would flow into the unnamed perennial stream at the south side of the facility.

The largest/tallest pipe directed any process wastewater that reached its level directly to the ditch on the west side of the facility as a bypass. The pipe was calculated to only take flow that exceeded the amount of a 25-year/24-hour storm and a 35 foot buffer was retained in the ditch below the outlet of this pipe. EPA observed the outlet of this pipe and noticed that the water beneath the pipe was darkly colored.

14: P9012522
Description: Feed bunkers.
Location: South of Dry Cow Barn.
Camera Direction: East
Date/Time: September 1, 2017 11:51 A.M.



15: P9012523
Description: Flow of storm water from feed bunkers is to the south.
Location: Feed Storage Pad.
Camera Direction: East
Date/Time: September 1, 2017 11:51 A.M.

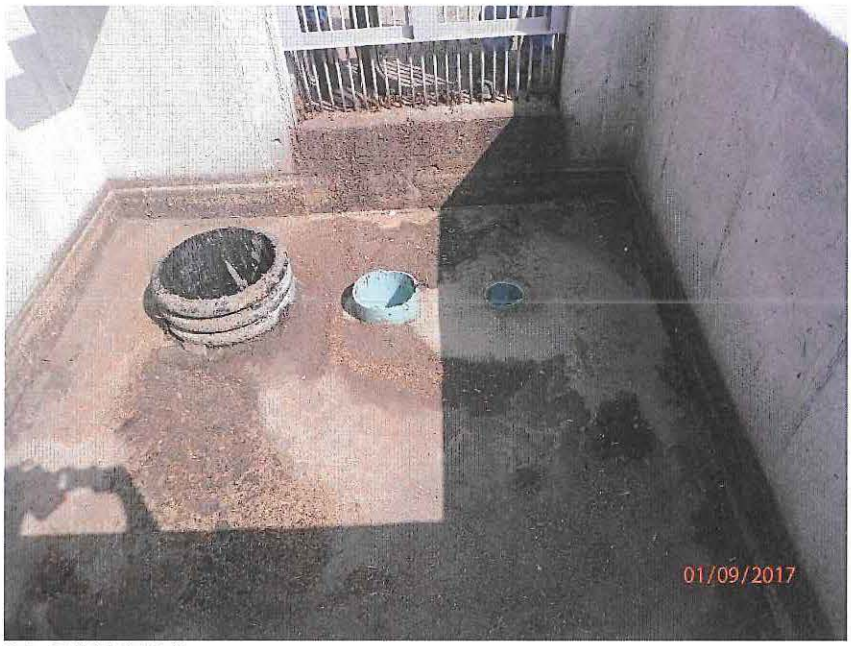


16: P9012524
Description: South side of Dry Cow Barn. Any process wastewater from this side of the barn would flow to the south.
Location: Feed Storage Pad.
Camera Direction: Northeast
Date/Time: September 1, 2017 11:52 A.M.

17: P9012525
Description: Bunker #7 is located along west wall of Feed Storage Pad.
Location: Feed Storage Pad.
Camera Direction: North
Date/Time: September 1, 2017 11:52 A.M.

18: P9012526
Description: A two foot retaining wall was built on the west side of the Feed Storage Pad to keep the flow of process wastewater from entering the ditch on the west side of the facility.
Location: Feed Storage Pad.
Camera Direction: South
Date/Time: September 1, 2017 11:55 A.M.

19: P9012527
Description: Retaining wall on west side of Feed Storage Pad prevents the flow of process wastewater to the ditch on the west side of the facility.
Location: Feed Storage Pad.
Camera Direction: North
Date/Time: September 1, 2017 11:56 A.M.



20: P9012528
Description: Collection pit with three pipes.
Location: South of the Feed Storage Pad.
Camera Direction: Down
Date/Time: September 1, 2017 11:57A.M.

21: P9012529
Description: Outlet for the bypass pipe in the ditch on the west side of the facility. Water beneath pipe was dark colored and appeared to have nutrients in it.
Location: Southwest of the collection pit.
Camera Direction: Down
Date/Time: September 1, 2017 11:59 A.M.

22: P9012530
Description: Channel from the outlet of the bypass pipe. Flow goes to the unnamed perennial stream.
Location: Southwest of the collection pit.
Camera Direction: Down
Date/Time: September 1, 2017 11:59 A.M.

23: P9012531
Description: Ditch on west side of facility flows south to the unnamed perennial stream which is located in the tree line.
Location: South of facility.
Camera Direction: South
Date/Time: September 1, 2017 12:01 P.M.

24: P9012532
Description: Ditch on west side of facility flows to the south. The unnamed perennial stream flows to the east along the southern edge of the facility.
Location: South of facility.
Camera Direction: Southeast
Date/Time: September 1, 2017 12:02 P.M.

25: P9012533
Description: Pipe from smallest pipe in collection pit flows underground to concrete manhole to the southeast.
Location: South of feed bunkers.
Camera Direction: West
Date/Time: September 1, 2017 12:03 P.M.

26: P9012534
Description: Concrete manhole receives process wastewater from the lowest pipe in the collection pit which then flows to a tank that has a pump in it. The process wastewater is pumped to Waste Storage Pond #2.
Location: South of the feed bunkers.
Camera Direction: South
Date/Time: September 1, 2017 12:03 P.M.

27: P9012535
Description: Looking down into the tank that contains the pump. The pump sends the process wastewater to Waste Storage Pond #2.
Location: South of the feed bunkers.
Camera Direction: Down
Date/Time: September 1, 2017 12:04 P.M.

28: P9012536
Description: The owner can activate the pump manually.
Location: South of the feed bunkers.
Camera Direction: West
Date/Time: September 1, 2017 12:04 P.M.

29: P9012537
Description: Spreader bar has weirs cut into it to allow the flow of process wastewater to flow evenly into the VTA.
Location: Spreader bar at top of VTA.
Camera Direction: Northeast and down
Date/Time: September 1, 2017 12:05 P.M.

30: P9012538
Description: Pipe that allows flow to enter the spreader box.
Location: Spreader bar at top of VTA.
Camera Direction: Northwest and down
Date/Time: September 1, 2017 12:05 P.M.

31: P9012539
Description: Weirs cut into spreader bar.
Location: Spreader bar at top of VTA.
Camera Direction: East and down
Date/Time: September 1, 2017 12:05 P.M.

32: P9012540
Description: Vegetated treatment area is 321 feed long and 120 feet wide and was installed in the former Pasture #1.
Location: Spreader bar at top of VTA.
Camera Direction: South
Date/Time: September 1, 2017 12:05 P.M.

33: P9012541
Description: There is another rock spreader 155.5 feet down the VTA.
Location: At the mid point of the VTA.
Camera Direction: Northwest
Date/Time: September 1, 2017 12:08 P.M.

34: P9012542
Description: Rock spreader half way down the VTA.
Location: At the mid point of the VTA.
Camera Direction: East
Date/Time: September 1, 2017 12:11 P.M.

EPA then walked to the unnamed perennial stream and noticed that the water appeared to be clear and free of bottom solids.

35: P9012543
Description: The unnamed perennial stream had water in it and it appeared clear.
Location: At the unnamed perennial stream south of the facility.
Camera Direction: Down
Date/Time: September 1, 2017 12:13 P.M.

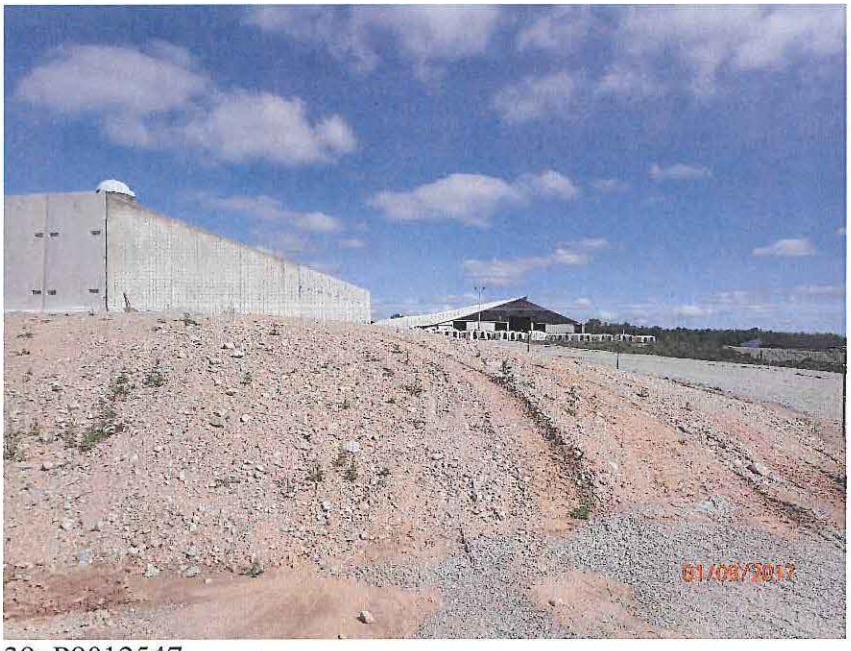
36: P9012544
Description: Looking upstream at the unnamed perennial stream.
Location: At the unnamed perennial stream south of the facility.
Camera Direction: West
Date/Time: September 1, 2017 12:13 P.M.

37: P9012545
Description: The unnamed perennial stream is in the tree line.
Location: At the unnamed perennial stream south of the facility.
Camera Direction: East
Date/Time: September 1, 2017 12:15 P.M.

EPA then walked north to observe Pasture #2. The fencing had been moved north so there was a vegetated buffer between the pasture and the unnamed perennial stream. EPA walked back north on the Feed Storage Pad and to the east north of the feed bunkers. A Cattle Walkway had a portion of the walkway that did not have containment for the manure or process wastewater. Just to the south of the Cattle Walkway, an open concrete area was utilized as a Dry Cow Feedlot. There was no containment for the manure or process wastewater from this area, either.

EPA also observed the superhutches and Calf Hutch Pad had no containment for manure or process wastewater. All the manure and process wastewater from these three areas would flow to the south to Pasture #2. Heavy precipitation could carry these pollutants to the unnamed perennial stream. The transport of the process wastewater through Pasture #2 would also be aided by the flow out of a storm water pipe that discharges storm water from the north side of the facility to the north end of Pasture #2.

38: P9012546
Description: Cattle are allowed out into Pasture #2. The fencing for Pasture #2 has been moved north so the cattle don't have access to the southern portion.
Location: Southwest corner of Pasture #2.
Camera Direction: East
Date/Time: September 1, 2017 12:18 P.M.



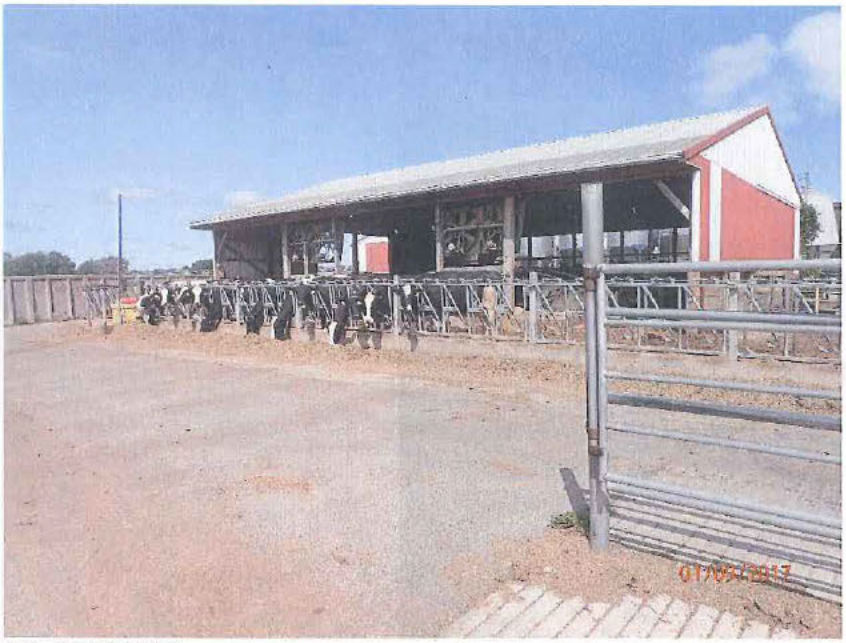
39: P9012547
Description: Hillside south of the feed bunkers has been graded.
Location: South of the Feed Storage Pad.
Camera Direction: North
Date/Time: September 1, 2017 12:19 P.M.

40: P9012548
Description: Spreader box with spreader bar to VTA on left side.
Location: Northeast corner of VTA.
Camera Direction: West
Date/Time: September 1, 2017 12:19 P.M.

41: P9012549
Description: Mountable curbing prevents the flow of process wastewater from flowing south off the Feed Storage Pad. It is instead directed to the Collection Pit.
Location: Southwest corner of Feed Storage Pad.
Camera Direction: Southeast
Date/Time: September 1, 2017 12:21 P.M.

42: P9012550
Description: Mountable curbing prevents the flow of process wastewater from flowing south off the Feed Storage Pad. It is instead directed to the Collection Pit.
Location: Southwest corner of Feed Storage Pad.
Camera Direction: South
Date/Time: September 1, 2017 12:21 P.M.

43: P9012551
Description: Collection pit for process wastewater from the Feed Storage Pad.
Location: Southwest corner of Feed Storage Pad.
Camera Direction: Southwest
Date/Time: September 1, 2017 12:21 P.M.



44: P9012552
Description: South side of Dry Cow Barn. Feed is open to precipitation and would flow to the south to the collection pit at the southwest corner of the Feed Storage Pad.
Location: South of Dry Cow Barn.
Camera Direction: Northwest
Date/Time: September 1, 2017 12:23 P.M.

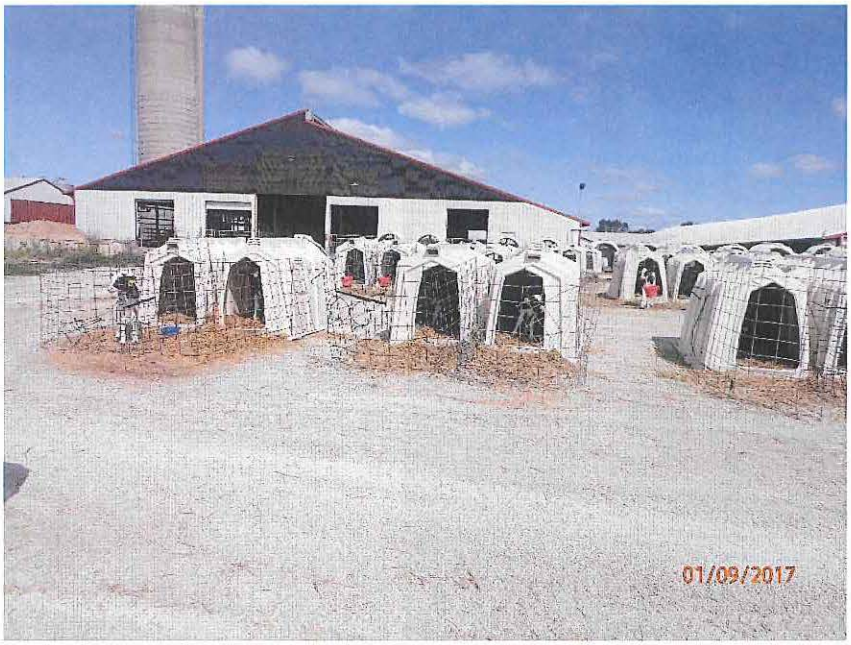
45: P9012553
Description: Cattle Walkway is open to precipitation. Manure and process wastewater would flow to the south to the Dry Cow Feedlot and then the south into Pasture #2.
Location: Southwest corner of Freestall Barn #2.
Camera Direction: North
Date/Time: September 1, 2017 12:23 P.M.

46: P9012554
Description: Dry Cow feedlot does not have any containment for manure or process wastewater.
Location: North of Bunker #1.
Camera Direction: Southeast
Date/Time: September 1, 2017 12:23 P.M.

47: P9012555
Description: Grate over the collection channel in Freestall Barn #2.
Location: South doors of Freestall Barn #2.
Camera Direction: North and down
Date/Time: September 1, 2017 12:24 P.M.

48: P9012556
Description: Superhutches on the south side of the Freestall barns.
Location: South of Freestall Barn #2.
Camera Direction: Northeast
Date/Time: September 1, 2017 12:31 P.M.

49: P9012557
Description: Extension of feed bunker.
Location: South of Freestall Barn #2.
Camera Direction: South
Date/Time: September 1, 2017 12:33 P.M.



50: P9012558
Description: Manure and process wastewater from the Calf Hutch Pad is not contained.
Location: Southwest corner of Calf Hutch Pad.
Camera Direction: North
Date/Time: September 1, 2017 12:33 P.M.

51: P9012559
Description: Manure and process wastewater from the Calf Hutch Pad is not contained.
Location: Southwest corner of Calf Hutch Pad.
Camera Direction: Northeast
Date/Time: September 1, 2017 12:33 P.M.

52: P9012560
Description: Manure and process wastewater from the calf hutches would flow to the south and into Pasture #2.
Location: Southwest corner of Calf Hutch Pad.
Camera Direction: Northeast
Date/Time: September 1, 2017 12:33 P.M.

53: P9012561
Description: Clean out riser pipe for the manure transfer line is located in Pasture #2.
Location: North of Pasture #2.
Camera Direction: West
Date/Time: September 1, 2017 12:35 P.M.

54: P9012562
Description: Storm water pipe under facility driveway outlets at the top of Pasture #2.
Location: North of Pasture #2.
Camera Direction: Southeast and down
Date/Time: September 1, 2017 12:40 P.M.

EPA observed Pature #3 and then walked east to the new Waste Storage Pond #2.

55: P9012563
Description: Pasture #3.
Location: Southwest corner of Pasture #3.
Camera Direction: North
Date/Time: September 1, 2017 12:41 P.M.

56: P9012564
Description: Pasture #3.
Location: Southwest corner of Pasture #3.
Camera Direction: North
Date/Time: September 1, 2017 12:41 P.M.

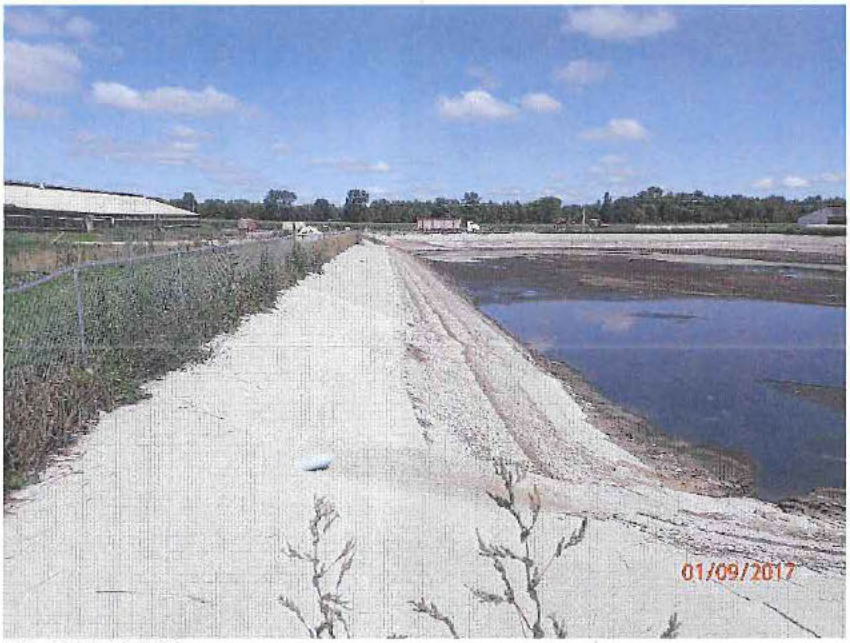
57: P9012565
Description: A pipe inlet inside the fencing collects storm water and outlets to the ditch on the east side of the facility.
Location: East of Pasture #2.
Camera Direction: West
Date/Time: September 1, 2017 12:44 P.M.

Waste Storage Pond #2 was built in 2015 and holds 10.8 million gallons. It receives manure and process wastewater from Waste Storage Pond #1 via a weir cut into the berm between them. It also receives process wastewater from the Feed Storage Pad via the pump in the collection tank. It has a ramp and a Solids Stacking Pad at the northwest corner. The pond is lined with concrete and has PVC markers along the ramp to indicate the depth of the manure in the pond, although none of the markers have the Maximum Operating Level (MOL) identified.

On the day of the inspection, the Waste Storage Pond #2 had approximately 14 feet of freeboard. A ditch on the east side of the facility had been tiled and relocated so that it went south along the east side of the pond and outletted at the north end of Pasture #3. EPA observed this outlet and the minimal amount of liquid beneath it appeared to be clear.

EPA then walked east to the Calf Barn and observed the silage pile that was stored on the ground to the south of the barn. The silage was tarped and only had a minimal amount of feed around the pile. Process wastewater from the silage would flow to the south to a crop field. The land in this area was flatter and EPA did not observe any flow pathways in the field that would indicate that the process wastewater from the silage would reach all the way to the south to the unnamed perennial stream.

The Calf Barn had a larger roof overhang than the other buildings and feed was kept pushed up near the cattle. Bedding was stored in the barn on the east side and waste storage (used bedding) and round hay bales were stored in the barn on the west side.



58: P9012566
Description: Waste Storage Pond #2 was built in 2015 and has storage capacity for 10.8 million gallons. Green pipe is for process wastewater from the tank south of the Feed Storage Pad.
Location: Southwest corner of Waste Storage Pond #2.
Camera Direction: North
Date/Time: September 1, 2017 12:44 P.M.

59: P9012567
Description: Waste Storage Pond #2 is lined with concrete.
Location: Southwest corner of Waste Storage Pond #2.
Camera Direction: Northeast
Date/Time: September 1, 2017 12:44 P.M.

60: P9012568
Description: Green pipe in southeast corner of pond was installed to allow for potential to take water from the pond and use to flush the barns.
Location: Southwest corner of Waste Storage Pond #2.
Camera Direction: East
Date/Time: September 1, 2017 12:44 P.M.

61: P9012569
Description: The ditch on the east side of the facility has been piped underground and around the east side of Waste Storage Pond #2. It outlets south of Waste Storage Pond #2.
Location: South of Waste Storage Pond #2.
Camera Direction: Northwest
Date/Time: September 1, 2017 12:49 P.M.

62: P9012570
Description: Outlet of storm water pipe south of Waste Storage Pond #2. In the summer, some plate cooler water may also be discharged through this pipe.
Location: South of Waste Storage Pond #2.
Camera Direction: Down
Date/Time: September 1, 2017 12:49 P.M.

63: P9012571
Description: Pipe for future potential to use pond water for flushing the barns.
Location: Southeast corner of Waste Storage Pond #2.
Camera Direction: West
Date/Time: September 1, 2017 12:52 P.M.

64: P9012572
Description: Round bales are stored east of Waste Storage Pond #2.
Location: East of Waste Storage Pond.
Camera Direction: North
Date/Time: September 1, 2017 12:53 P.M.

65: P9012573
Description: Silage stored on the ground south of the Calf Barn.
Location: East of Waste Storage Pond.
Camera Direction: Northeast
Date/Time: September 1, 2017 12:53 P.M.

66: P9012574
Description: Precipitation can transport silage to the south to a crop field.
Location: Southwest of the Calf Barn.
Camera Direction: Northeast
Date/Time: September 1, 2017 12:54 P.M.

67: P9012575
Description: A small amount of flow channelization in the field to the south of the Calf Barn.
Location: South of the Calf Barn.
Camera Direction: Down
Date/Time: September 1, 2017 12:55 P.M.

68: P9012576
Description: Precipitation can transport silage to the south to a crop field.
Location: South of the Calf Barn.
Camera Direction: West
Date/Time: September 1, 2017 1:00 P.M.

69: P9012577
Description: The owner stated that this silage pile should be fed out by November 2017 and silage wouldn't need to be stored there anymore.
Location: South of the Calf Barn.
Camera Direction: East
Date/Time: September 1, 2017 1:00 P.M.

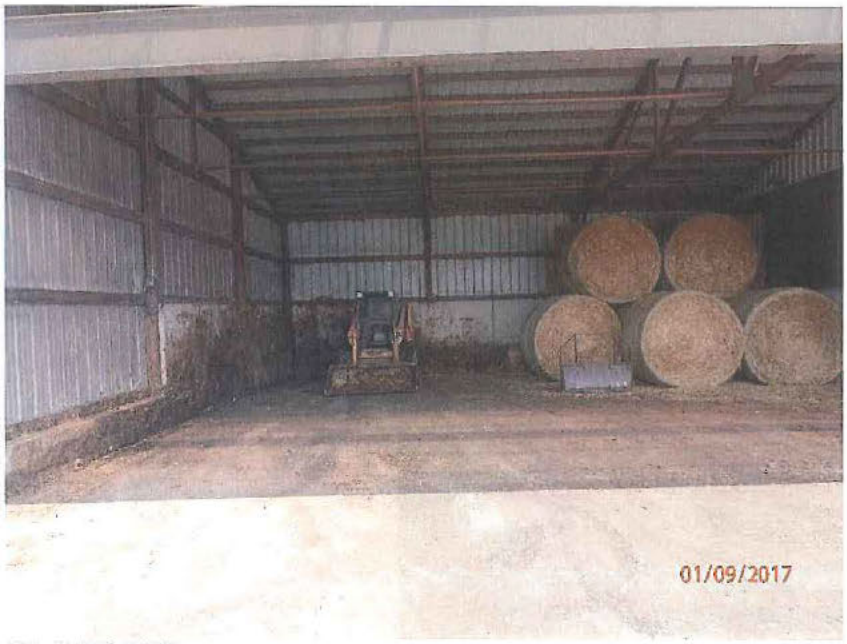
70: P9012578
Description: Roof overhang would keep precipitation from transporting feed from the feed lane of the Calf Barn.
Location: Southwest corner of the Calf Barn.
Camera Direction: Northeast
Date/Time: September 1, 2017 1:00 P.M.

71: P9012579
Description: Feed is kept pushed back to stay close to the cattle and under the roof overhang.
Location: South of the Calf Barn.
Camera Direction: Northeast
Date/Time: September 1, 2017 1:00 P.M.

72: P9012580
Description: Feed is kept pushed back to stay close to the cattle and under the roof overhang.
Location: South of the Calf Barn.
Camera Direction: West
Date/Time: September 1, 2017 1:00 P.M.

73: P9012581
Description: Haylage stored at the east end of the Calf Barn.
Location: Southeast corner of the Calf Barn.
Camera Direction: North
Date/Time: September 1, 2017 1:02 P.M.

74: P9012582
Description: Sandway Farms truck.
Location: South of the Calf Barn.
Camera Direction: East
Date/Time: September 1, 2017 1:04 P.M.

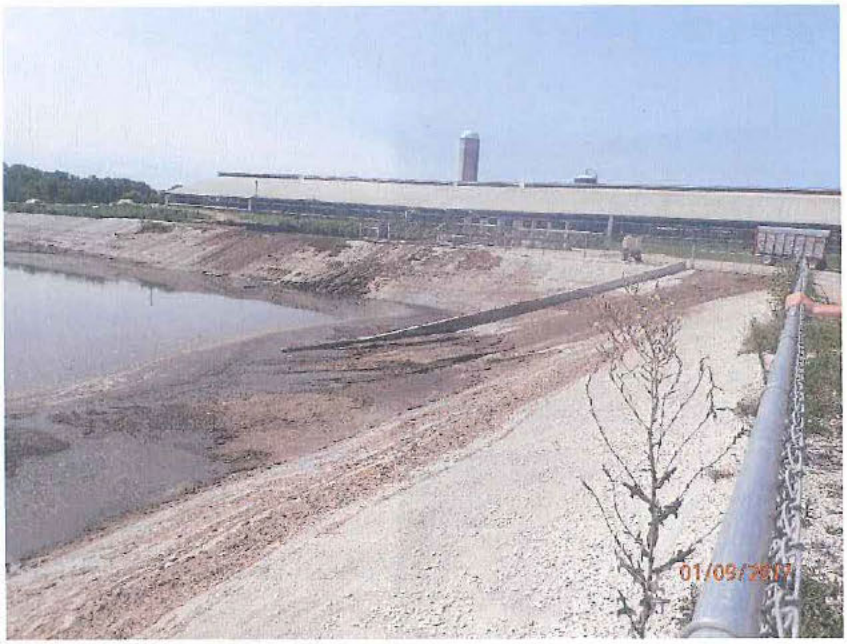


75: P9012583
Description: Round bales and waste storage under roof on the west side of the Calf Barn.
Location: Southwest corner of the Calf Barn.
Camera Direction: North
Date/Time: September 1, 2017 1:05 P.M.

76: P9012584
Description: North side of the Calf Barn is vegetated.
Location: Northwest corner of the Calf Barn.
Camera Direction: East
Date/Time: September 1, 2017 1:06 P.M.

77: P9012585
Description: Tile inlet for storm water pipe that outlets south of Waste Storage Pond #2.
Location: Northwest corner of the Calf Barn.
Camera Direction: North
Date/Time: September 1, 2017 1:07 P.M.

78: P9012586
Description: Waste Storage Pond #2.
Location: North side of Waste Storage Pond #2.
Camera Direction: South
Date/Time: September 1, 2017 1:07 P.M.



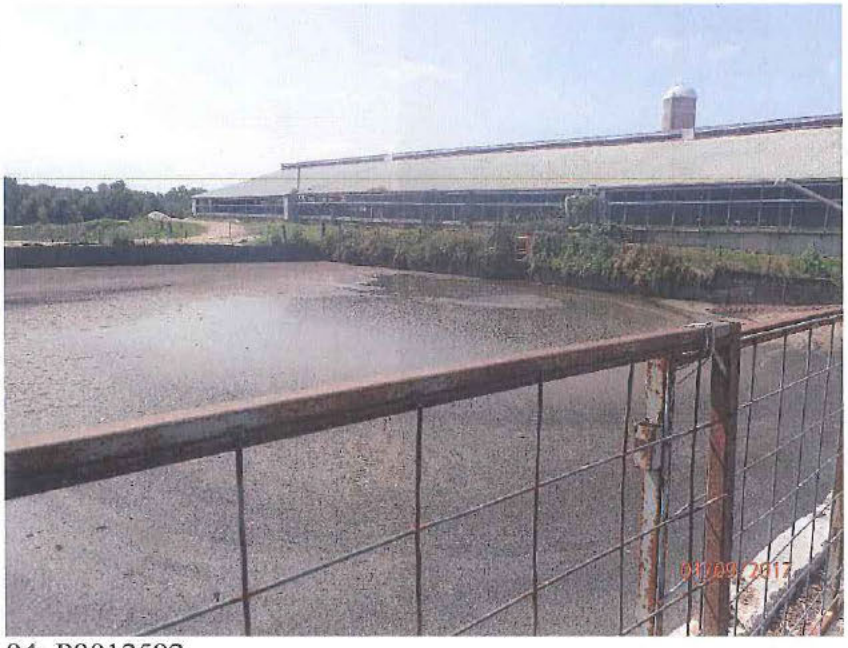
79: P9012587
Description: Depth markers are installed in the concrete wall into the pond.
Location: North side of Waste Storage Pond #2.
Camera Direction: Southwest
Date/Time: September 1, 2017 1:08 P.M.

80: P9012588
Description: Although there are depth markers installed in the concrete, none of them are marked to show where the maximum operating level (MOL) is.
Location: Northwest corner of Waste Storage Pond #2.
Camera Direction: South
Date/Time: September 1, 2017 1:08 P.M.

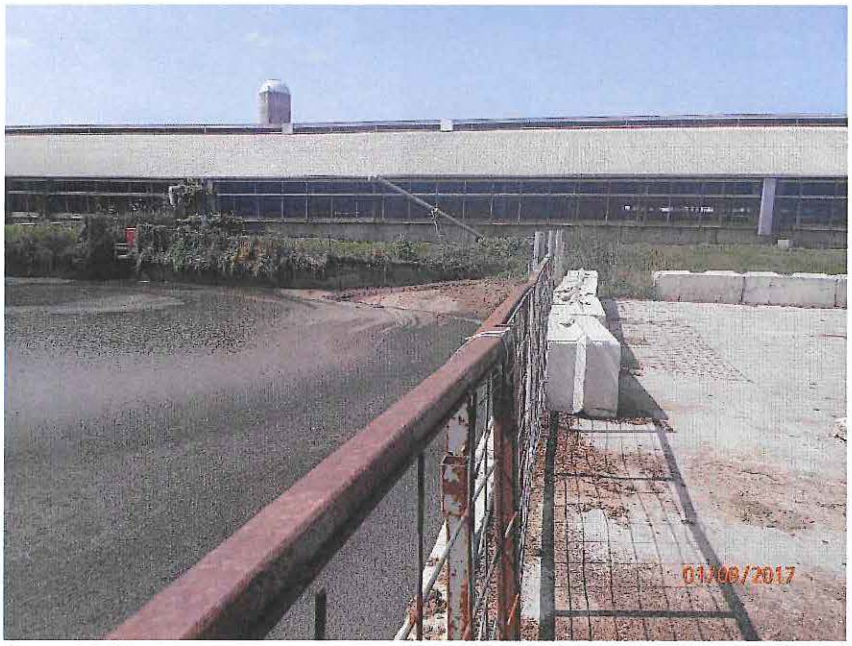
81: P9012589
Description: Concrete ramp to Waste Storage Pond #2.
Location: Northwest corner of Waste Storage Pond #2.
Camera Direction: East
Date/Time: September 1, 2017 1:08 P.M.

82: P9012590
Description: Manure application equipment stored on manure solids pad.
Location: Northwest corner of Waste Storage Pond #2.
Camera Direction: North
Date/Time: September 1, 2017 1:13 P.M.

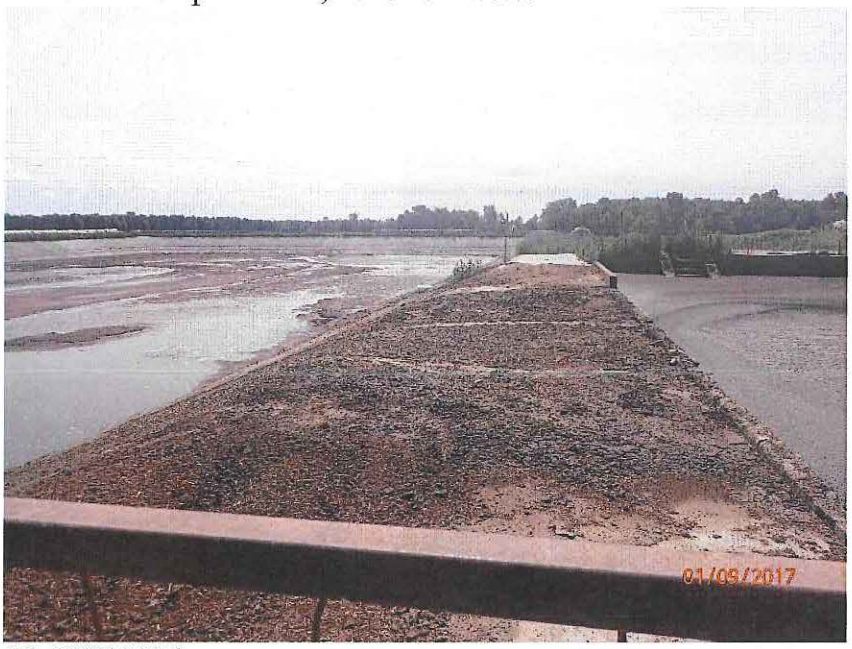
83: P9012591
Description: Waste Storage Pond #1 is concrete lined, also.
Location: Northeast corner of Waste Storage Pond #1.
Camera Direction: South
Date/Time: September 1, 2017 1:14 P.M.



84: P9012592
Description: Waste Storage Pond #1. Manure gravity flows to the pond from the center of Freestall Barn #1.
Location: Northeast corner of Waste Storage Pond #1.
Camera Direction: Southwest
Date/Time: September 1, 2017 1:14 P.M.



85: P9012593
Description: Waste Storage Pond #1.
Location: Northeast corner of Waste Storage Pond #1.
Camera Direction: West
Date/Time: September 1, 2017 1:14 P.M.

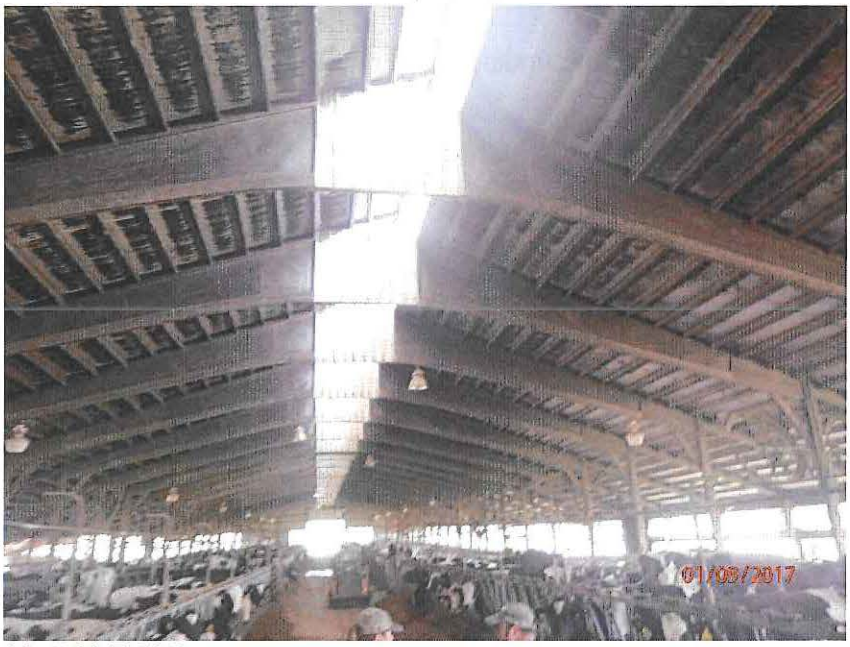


86: P9012594
Description: Manure can flow over the top of the berm between Waste Storage Pond #1 and #2. A valve can also be opened and allow manure to flow from Waste Storage Pond #1 to #2 through the white pipe in the berm.
Location: Northeast corner of Waste Storage Pond #1.
Camera Direction: South
Date/Time: September 1, 2017 1:14 P.M.

EPA then walked south along the east side of Freestall Barn #1 and observed that the barn had rain gutters which were tied into downspouts and piping which outlet in Pasture #2.
EPA walked north through the center alley of Freestall Barn #1 and noted that the facility stored new sand in a small bunker on the north side of the barn. Manure in the barn is scraped to the center and into the manure channel which flows, with the help of an auger, to Waste Storage Pond #1.

87: P9012595
Description: Gutters on Freestall Barn #1 are tied into underground piping which discharges in Pasture #2.
Location: East side of Freestall Barn #1.
Camera Direction: Northwest
Date/Time: September 1, 2017 1:20 P.M.

88: P9012596
Description: Gutters on Freestall Barn #1 are tied into underground piping which discharges in Pasture #2.
Location: East side of Freestall Barn #1.
Camera Direction: Northwest
Date/Time: September 1, 2017 1:20 P.M.



89: P9012597
Description: Freestall Barn #1.
Location: Center lane of Freestall Barn #1.
Camera Direction: North
Date/Time: September 1, 2017 1:23 P.M.

90: P9012598
Description: Manure is scraped to center of barn and to a manure channel. The manure flows to Waste Storage Pond #1 via gravity and with the assistance of an auger.
Location: Inside Freestall Barn #1.
Camera Direction: West
Date/Time: September 1, 2017 1:24 P.M.

91: P9012599
Description: Manure is scraped to center of barn and to a manure channel. The manure flows to Waste Storage Pond #1 via gravity and with the assistance of an auger.
Location: Inside Freestall Barn #1.
Camera Direction: West
Date/Time: September 1, 2017 1:24 P.M.

92: P9012600
Description: Inside Freestall Barn #1.
Location: Freestall Barn #1.
Camera Direction: West
Date/Time: September 1, 2017 1:24 P.M.

93: P9012601
Description: Inside Freestall Barn #1.
Location: Freestall Barn #1.
Camera Direction: Northwest
Date/Time: September 1, 2017 1:25 P.M.

94: P9012602
Description: Sandway Dairy Cow.
Location: Inside Freestall Barn #1.
Camera Direction: Northeast
Date/Time: September 1, 2017 1:26 P.M.

95: P9012603
Description: Clean sand is stacked outside Freestall Barn #1.
Location: North of Freestall Barn #1.
Camera Direction: East
Date/Time: September 1, 2017 1:27 P.M.

EPA concluded the walkthrough of the production area at approximately 1:30 P.M. at which time a closing conference was provided to the owner of Sandway Farm, LLC.

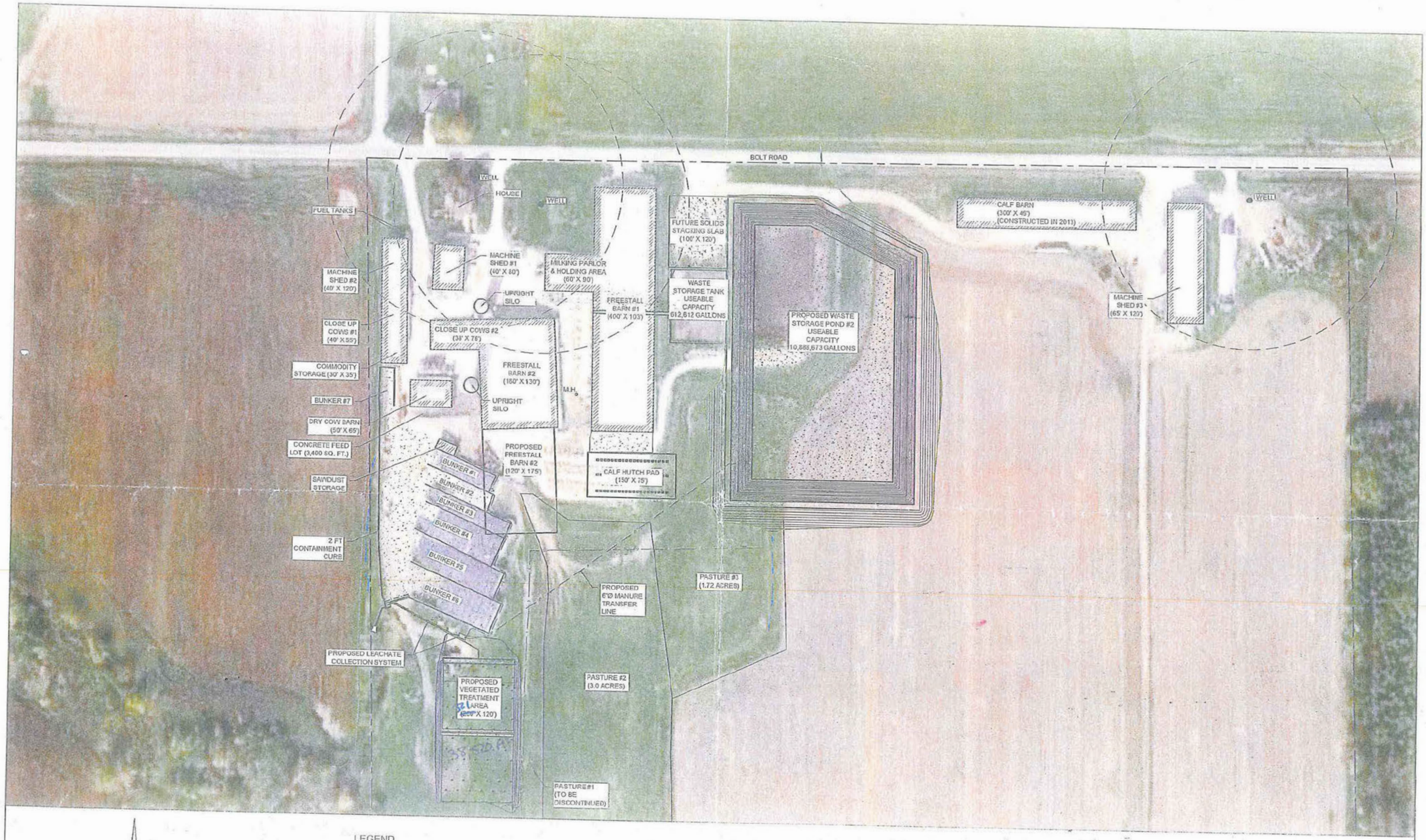


Figure 5

SITE PLAN
EXISTING AND PROPOSED CONDITIONS
FOIA Ex. 6 (Personal Priacy) FARMS, LLC
KEWAUNEE COUNTY, WISCONSIN

76570-11(002)CI-GB002 JUN 10/2015